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*Attorneys for Defendant Gerrit Klaerner*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

MICHAEL PARDI, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

vs.

TRICIDA, INC., and GERRIT KLAERNER,

Defendant.

Case No. 4:21-cv-00076-HSG

CLASS ACTION

**JOINT STIPULATION AND ORDER TO  
EXTEND CASE DEADLINES BY 30 DAYS**

Assigned to: Hon. Haywood S. Gilliam, Jr.

1           Lead Plaintiff Jeffrey Fiore (“Lead Plaintiff”) and Defendant Gerrit Klaerner (“Defendant”  
2 and together with Lead Plaintiff, the “Parties”) by and through their undersigned counsel, hereby  
3 stipulate as follows:

4           **WHEREAS**, on November 13, 2024, the Parties filed a Joint Notice of Pending Settlement  
5 (Dkt. 201) and a Joint Motion for a Stay to Facilitate Settlement (Dkt. 202).

6           **WHEREAS**, on November 13, 2024, the Court granted the Parties’ stay motion, and ordered  
7 that all proceedings in this matter, including all discovery and case deadlines shall be stayed pending  
8 finalization of the settlement documentation and a ruling on Lead Plaintiff’s Motion for Preliminary  
9 Approval of Settlement (Dkt. 204). The Order stated that if the Motion for Preliminary Approval of  
10 Settlement is not filed by December 30, 2024, the Parties shall file a joint status report regarding the  
11 status of settlement. *Id.*

12           **WHEREAS**, on December 30, 2024 the Parties filed a Joint Stipulation to extend the  
13 deadline for Lead Plaintiff to file the Motion for Preliminary Approval of Settlement or for the  
14 Parties to file a joint report regarding the status of settlement by an additional 30 days to January 29,  
15 2025 (Dkt. 205).

16           **WHEREAS**, on December 30, 2024, the Court granted the Parties’ stipulation and ordered  
17 the deadline for Lead Plaintiff to file the Motion for Preliminary Approval of Settlement or for the  
18 Parties to file a joint report regarding the status of settlement be extended by an additional 30 days to  
19 January 29, 2025 (Dkt. 206).

20           **WHEREAS**, Lead Plaintiff sent Defendant a draft Stipulation of Settlement and  
21 accompanying exhibits on December 3, 2024 and the parties have exchanged drafts in the  
22 intervening time.

23           **WHEREAS**, Lead Plaintiff sent Defendant a draft of a confidential opt-out agreement on  
24 January 9, 2025.

25           **WHEREAS**, Defendant is still reviewing the draft documents Lead Plaintiff sent and  
26 evaluating what bankruptcy approvals, if any, are required in light of the bankruptcy of former  
27 defendant Tricida, Inc.

28           **WHEREAS**, the Parties have met and conferred and agree that it would serve the interests of

1 efficiency and conserve resources to extend the current January 29, 2025 deadline for Plaintiffs to  
2 file the Motion for Preliminary Approval of Settlement or for the Parties to file a joint report  
3 regarding the status of settlement by an additional 30 days to February 28, 2025.

4 **NOW THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE**, pursuant  
5 to Civil L.R. 6-2, by and through their undersigned counsel:

- 6 1. The January 29, 2025 deadline either for Lead Plaintiff to file a Motion for Preliminary  
7 Approval of Settlement or for the Parties to file a joint report regarding the status of the  
8 settlement shall be extended by 30 days to February 28, 2025.

9  
10 Date: January 27, 2025

Respectfully submitted,

11 **SIDLEY AUSTIN LLP**

12 By: /s/ Sara B. Brody

13 Sara B. Brody (SBN 130222)

14 *Attorneys for Defendant Gerrit Klaerner*

15  
16 By: /s/ Jacob A. Walker

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26 *Attorneys for Lead Plaintiff Jeffrey M. Fiore*  
27 *and the Class*  
28

**LOCAL RULE 5-1 ATTESTATION**


I, Sara B. Brody, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order. In compliance with Local Rule 5-1(i)(3), I hereby attest that the other signatory to this document concurred in the filing of this document.

Date: January 27, 2025

By: /s/ Sara B. Brody  
Sara B. Brody

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: 1/27/2025

  
Honorable Haywood S. Gilliam, Jr.  
United States District Judge